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11/12/2014

November 7, 2014

Via E-mail and ECF

MEMO ENDORSED

Hon. Denise L. Cote,
United States District Judge,
Daniel Patrick Moynihan United States Courthouse,
500 Pearl Street, Room 1610,
New York, New York 10007-1312.

Re: FHFA v. Nomura Holding America Inc., et al., No. 11-cv-6201

Dear Judge Cote:

On behalf of all parties, we write to propose redactions to defendants' oppositions to plaintiff's Motions *in Limine* Nos. 3, 4, and 5, and supporting materials, pursuant to the Court's endorsement of defendants' October 24, 2014 letter. (Doc. No. 882.)

The parties have met and conferred and agree that, consistent with Sections 2.6, 2.7, 2.8 and 2.9 of the First Amended Protective Order dated January 11, 2013, Exhibits J, K, L, and M to defendants' opposition to plaintiff's Motion *in Limine* No. 3 and Exhibit I to defendants' opposition to plaintiff's Motion *in Limine* No. 5 cannot be easily redacted and propose that these Exhibits be filed under seal. These Exhibits contain non-party borrower information.

The parties also agree that the Exhibits identified in the following charts should be filed in redacted form.

Hon. Denise L. Cote

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Defendants' Opposition to Plaintiff's Motion <i>in Limine</i> No. 3		
Exhibit	Location of Redaction	Reason for Redaction
Exhibit P	pp. 10, 11	Cell phone number
Exhibit R	pp. 12, 13	Cell phone number
Exhibit U	pp. 27, 28	Cell phone number
Exhibit Z	pp. 1, 4-7, 9	Cell phone number

Defendants' Opposition to Plaintiff's Motion <i>in Limine</i> No. 4		
Exhibit	Location of Redaction	Reason for Redaction
Exhibit E	pp. 10, 11	Cell phone number
Exhibit F	pp. 12, 13	Cell phone number
Exhibit I	pp. 27, 28	Cell phone number
Exhibit N	pp. 2, 4	Account number and IRS number

Highlighted copies of the above-listed exhibits are being submitted to the Court via e-mail.

Approved,
 Denise L. Cote
 Nov. 12, 2014

Hon. Denise L. Cote

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Respectfully Submitted,

/s/ Philippe Z. Selendy

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